

Atty Docket No. NOKIA.5006US

REMARKS

Claims 1-27 are pending in this application. Claims 1-3, 5-14, and 17-27 are to be amended by this Amendment.

The Office Action dated June 27, 2005 rejected claims 1, 3, 8 and 10 as being anticipated by prior art. The Office Action also rejected claims 2, 4-7, 9 and 11-27 as being obvious in view of the prior art. Claims 28-51 were previously cancelled as being directed to a non-elected invention and are now included in a separate divisional application.

Anticipation Rejection

The grounds for the anticipation rejection of claims 1, 3, 8, and 10 is set forth in part 2 on pages 2-3 of the Office Action. Specifically, the rejection asserts that the claims are anticipated by the embodiment illustrated in Fig. 3 and described at column 6 of U.S. Patent No. 6,085,069 issued to Sharpe (this embodiment hereinafter being referred to simply as "Sharpe"). Applicants again respectfully traverse the rejection at least because it does not establish a prima facie case that Sharpe includes each and every one of the combination of features recited in the claims.

Independent claim 1 is directed to a method and recites the features of "storing persistently profile-specific information" in a profile-specific dictionary and "using the profile-specific dictionary for message compression." Independent claim 8 is directed to a system and recites substantially similar features.

With respect to the feature of profile-specific information persistently stored in a profile-specific dictionary, the previous Office Action referred to telephone numbers discussed at col. 6, lines 1-37, of the patent and the currently outstanding Office Action now refers to column 4, line 60 to column 5, line 7, of the patent, discussing that the most frequently used numeric data, alpha-numeric data, and/or phrases or complex graphical data is stored in a non-volatile, reprogrammable store. It is also discussed therein that a memory location reference indicator is assigned to each item of data and when this item is included in a message to a particular pager, a more compact memory location reference indicator is substituted.

At page 9-10, the Office Action mistakenly interprets the profile-specific information. First, the Office Action twice refers to the requirement of 35 USC 112, sixth paragraph.

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However, independent claim 1 does not contain means-plus-function language according to 35 USC 112, sixth paragraph.

Furthermore, according to the description in the application, the profile-specific dictionary persistently stores signaling messages that are specific to a profile for a specific mobile station and/or a user of a mobile station (see, for example, page 12, second paragraph). Although this description never mentions the telephone number, the Office Action argues discusses that this is "inherently included" when Sharpe creates and updates the most frequently used words and/or phrases dictionary for a particular subscriber. Applicants respectfully submit that it is not inherent that the page number is included in every communication message transmitted to/from the pager and hence would be the top candidate for the n most frequently used telephone numbers. The rejection is based on conjecture and does not provide any support showing that the recited features are inherent in Sharpe.

Obviousness Rejection - Claim 2

The grounds for the obviousness rejection of claim 2 is set forth in part 4 on pages 3-4 of the Office Action. Specifically, the rejection asserts that the claims are obvious in view of Sharpe without citing any additional reference.

Claim 2 is dependent on claim 1 and additionally recites that the profile-specific information stored persistently in the profile specific dictionary comprises device information. The rejection acknowledges that Sharpe does not include this feature, but asserts that it would have been obvious to modify Sharpe "to further include most frequently used device information such as its identity in the dictionary, for further improving the compression ratio of the message." Applicants respectfully traverse the rejection because it fails to point to any motivation in the prior art for making the proposed modification of Sharpe, and there would be no reason to do so except the hindsight provided by this application.

At pages 10-11, the Office Action states that "it is clear" that the pager identity would obviously be one of the top candidate for the n most frequently used items" and refers to a sentence in the patent which states that "[I]n the event of the pager sending response signals as PRDS signals then the control processor 54 comprises means for determining the sequence to be transmitted having regard to the identity of the pager and/or information in the original down-

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link message." However, the cited sentence merely states that the sequence of transmitted signals should have due regard to the pager identity and it does not suggest or otherwise make it "clear" that the pager identity should be included in the messages or in the dictionary.

Obviousness Rejection - Claims 14 and 21

The grounds for the obviousness rejection of claims 14 and 21 is set forth in part 6 on pages 5-6 of the Office Action. Specifically, the rejection asserts that the claims are obvious in view of the method discussed in paragraphs 13-17 of European Patent Publication No. 0933876A1 filed by Bellovin (this method hereinafter referred to simply as "Bellovin"). Applicants respectfully traverse the rejection because it fails to establish a prima facie case of obviousness that a method having each and every one of the combination of features recited in the claims would have been obvious.

For example, independent claim 14 (claim 21 is dependent on claim 14) recites "searching for a common dictionary based on [a setup message received from a mobile station]", "attempting to validate" the common dictionary when found, and "providing a common dictionary identifier associated with the common dictionary to the mobile station..." An exemplary, non-limiting, embodiment of a method containing such features is shown at, for example, steps 112, 114, and 116 in Fig. 3A and steps 120, 122, 124, 128, and 130 in Fig. 3B of this application.

However, instead of searching for a common dictionary, in Bellovin, a fixed compression dictionary is sent by the mobile station during the start up of a communications session. In other words, the mobile station sending the setup message selects the dictionary. Consequently, searching for a common dictionary is unnecessary and is not performed in Bellovin. Although it is mentioned (see col. 4, lines 9 to 12, of the patent) that a pointer may be sent by the mobile station which identifies from where to retrieve the compression dictionary (instead of providing the dictionary), there still is no "searching" as recited in claim 14. The mobile station sending the dictionary or pointer has already selected an appropriate dictionary.

At pages 11-12 of the Office Action, the Office Action recites col. 4, lines 43-46, of the publication that "at the beginning of the session, the terminal could select the appropriate static dictionary based on the data type to be employed in that given transmission" and asserts that the

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term "selecting" is equivalent to the term "searching." However, this is a mistaken interpretation of the claim language unsupported by this application or any cited prior art.

In Bellovin, there is also no attempt to validate a common dictionary as recited in claim 14. Since the mobile station has already selected the dictionary at startup, it is unnecessary to validate a dictionary. Similarly, since the mobile station has already selected the dictionary, Bellovin does not need to provide a common dictionary identifier associated with a common dictionary to the mobile station as recited in claim 14.

The Office Action asserts that the validation features "are made obvious by Bellovin for validating a dictionary as claimed, in order to ensure the appropriate static dictionary is found..." because there would be no validation if a searching dictionary was not found. This assertion is again premised on a distorted interpretation of the claim language that is unsupported by this application or any cited prior art. Furthermore, it is erroneous to conclude that it is obvious that validation would need to be performed when selecting a dictionary. It is not clear that the selected dictionary must be found and thus would obviously be validated before it is selected.

Claim Amendments

Notwithstanding the above reasons set forth in traversing the outstanding rejections, applicants have amended the claims to provide clarification of the disputed features. Applicants respectfully submit that the amendments put the claims into condition for allowance because they remove any uncertainty caused by interpretation of the language in the claims.

Independent claims 1, 8, and 22 (and their dependent claims where appropriate) are amended to recite that the profile specific dictionary is for storing signaling messages specific to the profile for a specific mobile station or user of a mobile station. This clarifies the feature of a profile specific dictionary discussed above. Exemplary, non-limiting, support for these amendments can be found at, for example, page 10, lines 12-13, page 14, lines 4-8, page 19, line 20 et seq. and pages 20 and 21 of this application as published.

Independent claim 14 (and its dependent claims) are amended to recite that a network station receiving the setup message from the mobile station determines which dictionary is to be used in the communication and that in the validation procedure it is checked whether the dictionary found by the network station and a corresponding dictionary of the mobile station

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have the same content. Exemplary, non-limiting, support for these amendments can be found in the paragraph bridging pages 27 and 28 of this application as published.

In contrast to amended claim 14, in Bellovin, a fixed compression dictionary is sent from a first terminal to a second terminal during the start up of a communications session between the terminals. Alternatively, a pointer can be sent from the first terminal to the second terminal which pointer identifies from where the second terminal can retrieve the compression dictionary (see column 4, lines 9 to 12, of the publication). The terminal sending the dictionary may select an appropriate static dictionary based on the data type to be employed in the given transmission. In Bellovin, the mobile station sending the setup message determines the dictionary to be used. There is no communication between stations and no validation of a common dictionary as recited in amended claim 14.

Conclusion

Applicants respectfully submit that the claims are allowable over the cited prior art for at least the reasons set forth. Applicants also request entry of this Amendment and the mailing of a Notice of Allowance.

Applicants hereby petition for a one month extension in which to file this Amendment. The Commissioner is hereby authorized to charge the extension fee and any other fees necessary for the consideration of this paper, or to credit any overpayment, to the undersigned attorney's Deposit Account No. 10-0100 (Atty. Docket NOKIA.5006US).

Respectfully submitted,



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